



**SHERWIN-WILLIAMS.**

THE SHERWIN-WILLIAMS COMPANY  
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March 2, 2010

Mr. Ray Klimcsak  
U.S. Environmental Protection Agency  
Region 2  
290 Broadway 19<sup>th</sup> Floor  
New York, New York 10007-1866

RE: Aqueous Sump Sample Collection Technical Memorandum  
For 2 and 4 Foster Avenue, Gibbsboro, New Jersey

Sherwin-Williams/Hilliards Creek Site  
Gibbsboro, New Jersey  
AOC Index Number: No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

As part of the ongoing Remedial Investigation/Feasibility Study (RI/FS) activities, Sherwin-Williams has prepared this Technical Memorandum to address sampling activities requested by the United States Environmental Protection Agency (EPA) in their letter dated January 27, 2010 (received on February 1, 2010 by Sherwin-Williams).

The EPA had previously collected sub-slab air samples (December 6-9, 2008) and indoor-air samples (March 26, 2009) at select commercial buildings located within the Paint Works Corporate Center, owned by Brandywine Realty Trust (Brandywine). The EPA sampling results indicated that Volatile Organic Compounds (VOCs) were present in the sub-slab air; however indoor-air sampling established that many of these compounds were not present in the indoor-air. The EPA indoor-air results indicated that trichloroethylene (TCE) was found indoors at levels above the EPA Region 2 screening criteria within 2 and 4 Foster Avenue.

Based on the evaluation of these results, the EPA requested that Brandywine provide them with a product inventory from the affected buildings, which Brandywine submitted to EPA on November 25, 2009. Based on EPA's review of the product inventory information provided by Brandywine, it is EPA's conclusion that the inventory contained within the buildings may not be the source of the TCE. Also included with the inventory provided by Brandywine, was the identification of three sumps located in buildings 2 and 4 Foster Avenue. Due to this new information, EPA is now requesting that Sherwin-Williams sample and analyze any standing water that is present in these sumps. The samples will be analyzed for VOCs only

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The intent of this Technical Memorandum is to reference the procedures that will be utilized to collect an aqueous sample from the above-referenced sumps, as well as the appropriate laboratory analytical methods. The sump locations were identified on the two attached figures provided by the EPA in their January 27, 2010 correspondence that are also included as part of this Technical Memorandum.

### Sump Survey and Sampling

Sherwin-Williams proposes to visually inspect each of the sumps in an effort to evaluate their integrity and also to determine if the source of their drainage is above-grade perimeter drains or sub-surface slab drainage.

A product inventory and inspection will be performed in the general area of each sump.

A photoionization detector (PID) will be used to screen for the presence of any VOCs in the vicinity of the sump as well as within the sump itself.

Prior to sampling, the depth of water in each sump will be noted. The composition of the sump bottom (hard, soft, concrete, gravel, etc.) will be evaluated by using a tile probe or other similar tool.

Three sump volumes of water will be evacuated using a peristaltic pump and the rate of recharge noted and evaluated. The purge water will be containerized for disposal.

When the sump is emptied, its construction will be evaluated for integrity and the composition of the sump bottom will be noted.

When the sump has recharged sufficiently, a sample will be collected using either a bailer or clean sample jar directly, depending upon the diameter of the sump and the depth of water contained within. If there is no water in the sump, or if it does not recharge after purging, then a sample will not be collected.

If the water level in the sump does not recover sufficiently in one hour to allow a sample to be collected, then the sampling team will return four hours after purging to collect a sample. If the water level has still not recovered after the additional four hours of wait time, then the sampling team will return the next day to collect a sample. If sufficient volume has not recharged after 24 hours then EPA will be contacted and a determination as to whether to collect a sample at a later date will be evaluated.

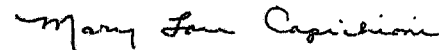
Samples will be submitted for Target Compound List (TCL) VOCs using EPA Contract Laboratory Program (CLP) Statement of Work (SOW) SOM01.2 (trace level) Method.

In addition to investigative samples, QA/QC samples will be collected in accordance with the Quality Assurance Project Plan (QAPP) provided in Appendix B in the *"Supplemental Remedial Investigation Work Plan – Sherwin-Williams/Hilliard Creek Site – Former Manufacturing Plant – Gibbsboro, NJ"* revised July 2009.

All observations and notes will be recorded in the field tablet and then posted to Team Link, as is currently the practice.

Should you have any other recommendations or if you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at [mlcapichioni@sherwin.com](mailto:mlcapichioni@sherwin.com).

Sincerely,



Mary Lou Capichioni  
Director Remediation Services

#### Attachment

cc: J. Josephson, EPA (New York)  
W. Sy, EPA (Edison)  
J. Doyon, NJDEP (4 copies)  
P. Parvis, HDR  
J. Gerulis, Sherwin-Williams (w/o enclosures)  
A. Danzig, Sherwin-Williams (w/o enclosures)  
S. Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione (w/o enclosures)  
H. Martin, ELM  
R. Mattuck, Gradient  
S. Jones, Weston Solutions  
S. Clough, Weston Solutions  
A. Fischer, Weston Solutions

